

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of)

Amendment of 47 CFR Parts 2, 13 and 80 of the )  
Commissions Rules Concerning Maritime )  
Communications )

WT Docket No. 00-48  
FCC 02-102  
RM-9499

**Petition for Reconsideration by  
Owen Anderson, GMDSS Instructor and Consultant**

Submitted September 8, 2003

My profession experience and qualifications have been listed in my previous comments and will not be repeated here.

Sec. 13.201 Qualifying for a commercial operator license or endorsement.

(b)(6)(7) require Written Elements 1 and 7 or 7R, or a Proof of Passing Certificate (PPC) issued by the United States Coast Guard or its designee representing a certificate of competency from a Coast Guard-approved training course for a GMDSS endorsement.

**Comment:** This rule would appear to authorize USCG approved training organizations to issue a PPC directly without going through a COLEM. However, it does not appear to authorize the training organization to give Element-1 exams which would be required if the student did not already have an FCC-MP license or PPC for Element-1.

Sec. 80.335 Procedures for canceling false distress alerts.

(a)(2), (b)(2) and (c)(2) state:

Transmit a **DSC** distress alert cancellation (i.e., own ship's acknowledgment), if that feature is available;

**Comment:** Most existing GMDSS equipment has a "DSC ACKNOWLEDGE" function which has been proved to be a major problem. "DSC" should never be used to acknowledge a "DSC DISTRESS ALERT". More recent equipment may contain an "Own Ships Ack" function but I have not seen such equipment and most existing installations will NOT have this function.

My concern is that the wording may lead the operator into thinking he should use the "ACK" function on current equipment.

Sec. 80.409 Station logs.

(e) (1) A summary of all distress communications heard, and urgency communications affecting the station's own ship.

**Comment:** The above statement could be interpreted to mean that both distress and urgency communications that only affect the stations' own ship need be logged. I suspect however that the intent is that "ALL" distress communications are to be logged even if they originate half way around the world. (As many frequently do).

I have previously registered strong objections to retaining this vestige of antiquity which might have made some sense when there was a dedicated radio officer who could afford to spend the time required for compliance. It not only makes NO sense today where there is NO dedicated person with no other duties than conducting communications but I submit that it is a dangerous burden to impose on the bridge watch officer who has many other duties that really involve the safe operation and navigation of the vessel that certainly are of a higher priority than the impossible task of maintaining an accurate summary of all distress communications heard just so reams of paper can be stored away in shore archives never again to see the light of day until the 3 years run out and they can be destroyed. If this requirement is seriously considered to be that important then instead of archiving this data it should be forwarded to the Commission for their review and

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information. I am confident that the response will be that insufficient resources are available. I submit that the time resources of the bridge watch officer are insufficient to fully comply with this requirement.

The radio station log is unique in that entries are required that have no relevance to your own vessel. Both the Deck and Engine logs are limited to events occurring on or involving your own vessel. The same should apply to the radio station log.

This sentence should read: "A summary of all distress and urgency communications heard affecting the station's own ship."

If the intent is to actually require "ALL" distress communications to be logged then it would clarify this section to split it into 2 completely separate requirements:

1A- A summary of all distress communications heard.

1B- A summary of all urgency communications affecting the station's own ship.

(3) An entry that pre-departure equipment checks were satisfactory and that required publications are on hand. Daily entries of satisfactory tests to ensure the continued proper functioning of GMDSS equipment shall be made.

(5) A weekly entry that:

(i) The proper functioning of digital selective calling (DSC) equipment has been verified by actual communications or a test call;

(ii) The batteries or other reserve power sources are functioning properly;

(iii) The portable survival craft radio gear and radar transponders have been tested; and

(iv) The EPIRBs have been inspected.

**Comment:** This section is too vague. It needs to be more specific as to exactly what equipment shall be tested for pre-departure and daily tests.

I have previously commented that the weekly interval for testing survival craft radios and radar transponders was too frequent especially for the VHF hand held radios. We have numerous reports of battery failure in these units when tested too frequently. There is NO mention here for actually testing the EPIRB. These were previously tested monthly. There are 2 SARTs and 3 SCT units on most vessels and only 1 EPIRB. It is not logical to me that the first two units should be tested weekly while the sole EPIRB is only tested monthly.

In 80.1099 there is a requirement for a monthly test of the batteries of all portable equipment. Please see additional comments under that section. It would seem logical to have a monthly testing requirement for all portable equipment. This would be an adequate interval without the risk of excessive battery use. In any case, the conflict with 80.1099 should be resolved.

Sec. 80.1073 Radio operator requirements for ship stations.

(a)(1) A qualified GMDSS radio operator must be designated to have primary responsibility for radiocommunications during distress incidents, except if the vessel operates exclusively within twenty nautical miles of shore, in which case a qualified restricted radio operator may be so designated.

**Comment:** This is referring to a GMDSS fitted vessel. In GMDSS distances are not specified in nautical miles but rather in terms of Sea Areas defined in this instance as area A-1 which is within the range of a VHF Shore Station. The actual distance might be anywhere from 10 to 100 miles or more.

Sec. 80.1099 Ship sources of energy.

(f)(2) Battery charge levels should be checked at intervals of 30 days or less with equipment turned ON and the battery charger turned OFF. Portable equipment with primary batteries such as EPIRBs and SARTs should be checked at the same intervals using methods recommended by the manufacturer. The results of battery checks should be recorded in the radio log.

**Comment:** First, there is a conflict with testing requirements listed under 80.409. Then there is the statement "using methods recommended by the manufacturer". Most of these units use sealed primary batteries that are not accessible for direct measurement. They can only be evaluated by actually testing the equipment to ensure proper operation. They are also required to be replaced every 5 years.

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Sec. 80.1123 Watch requirements for ship stations.

(d) Every ship required to carry a radiotelephone watch receiver must maintain, while at sea, a continuous watch on the radiotelephone distress frequency 2182 kHz. This watch must be kept at the position from which the ship is normally navigated or at a position which is continually manned.

**Comment:** This is in the GMDSS section. There should be NO requirement for a 2182 khz watch. There is enough distraction by the requirement to monitor Ch-16 without compounding the confusion by adding 2182.

As a final comment I would like to again address the issue of not having all the rules related to a GMDSS Radio Station in a single section. I also feel that numerous references to other publications, while reasonable in many cases, creates an additional burden for the GMDSS operator. In fact, some of the rules contained in Parts 1, 2 and 13 that impact the operator are not even a required document on board ship. The two most important issues are the ones concerning log keeping and equipment testing. It is very important that there be very clear rules involving equipment testing and that these rules are reasonable. I will be glad to respond to any request for clarification or additional information.

Thank you,

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